

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

United States of America,

File No. 24-CR-99(2) (PDW)

Plaintiff,

v.

Diana Quezada,

**MOTION TO CONTINUE
TRIAL AND EXCLUDE
TIME UNDER SPEEDY TRIAL
ACT.**

Defendant.

Defendant Diana Quezada (“Defendant”), by and through her attorney, hereby motions this Court for an Order extending the Trial date and to continue any other deadlines and/or hearings previously set for at least sixty (60) days.

This Court’s Pretrial Order, previously filed, scheduled Trial for September 10, 2024. [Docket No. 68]. Additionally, said Order set a deadline for any Pretrial motions to be to be filed no later than twenty-eight (28) days prior to Trial, or August 13, 2024.

Defendant recently retained new counsel who has not yet received discovery from the Government. Once received, Defendant’s counsel will need a significant amount of time to fully review these evidence and then review it with Defendant.

Until that has been done, the parties will not have a meaningful opportunity to confer about the case or to discuss potential resolution. Defendant is in custody, but she is not demanding a Speedy Trial.

Further, if this motion is granted, pursuant to 18 USC § 3161(h)(7)(A), Defendant moves this Court to exclude the period of time from the date of the Court’s Order on this motion from the Speedy Trial Act computations in this case.

For these reasons, Defendant would request an extension of the Trial date for at least

sixty (60) days, as well as an extension of at least sixty (60) days for any other deadlines or hearings. Defendant's counsel has been in contact with AUSA Dawn Deitz, about this request and she had no objection.

Dated: August 1, 2024

Anderson Law Firm, PLLC

/s/ Kirk M. Anderson

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